

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

UNITED STATES OF AMERICA

Plaintiff,

V.

LIMETREE BAY TERMINALS, LLC, WEST
INDIES PETROLEUM LIMITED, PORT
HAMILTON REFINING AND
TRANSPORTATION, LLLP, and the
TRANSITION REFINERY ENTITY, INC.

Defendants.

Civ. A. No. 1:21-cv-00264(WAL/EAH)

**UNITED STATES' REPLY TO LIMETREE BAY
TERMINALS, LLC'S RESPONSE TO UNITED STATES' MOTION TO
DIRECT DEFENDANTS TO ABIDE BY THE JOINT STIPULATION IN
ACCORDANCE WITH THE BANKRUPTCY SALE ORDER**

The United States’ pending Motion seeks to hold West Indies and Port Hamilton to the terms of the Joint Stipulation in accordance with the Sale Order and does not impact Limetree Bay Terminals, LLC’s (“Terminals”) existing obligations under the Joint Stipulation. (ECF 46 and 47). The United States acknowledges that Terminals is unable to unilaterally comply with certain requirements of the Joint Stipulation and that inability supports the United States’ position that this Court should give full effect to the terms of the Sale Order and issue an order imposing the substantive requirements of the Joint Stipulation on both West Indies and Port Hamilton.

Respectfully submitted,

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division
United States Department of Justice

s/Myles E. Flint, II

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 31, 2023, he filed the *United States' Reply to Limetree Bay Terminals, LLC's Response to United States' Motion to Direct Defendants To Abide By The Joint Stipulation In Accordance With The Bankruptcy Sale Order* electronically with the Clerk of Court using the CM/ECF system, which will send notifications of this filing to all who have made appearances.

s/Myles E. Flint, II